

KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222
Arthur Steinberg
Scott Davidson

KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Richard C. Godfrey, P.C. (admitted *pro hac vice*)
Andrew B. Bloomer, P.C. (admitted *pro hac vice*)

Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
-----X		

NOTICE OF CROSS-APPEAL

PLEASE TAKE NOTICE that General Motors LLC (“**New GM**”) hereby cross appeals under 28 U.S.C. § 158(d)(2) and Rules 8002(a)(3) and 8006(e) of the Federal Rules of Bankruptcy Procedure to the United States Court of Appeals for the Second Circuit from the *Judgment* entered by the United States Bankruptcy Court for the Southern District of New York (“**Bankruptcy Court**”) in the above-referenced proceeding on June 1, 2015 (the “**Judgment**”), pursuant to the Certification of a Direct Appeal of the Judgment issued by the Bankruptcy Court on June 1, 2015 under Rule 8006(e) (the “**Certification**”). Copies of the Judgment, the *Decision on Motion to Enforce Sale Order*, entered by the Bankruptcy Court on April 15, 2015, and the

Certification are annexed hereto as Exhibits “A,” “B” and “C” respectively.

PLEASE TAKE FURTHER NOTICE that in the event that the United States Court of Appeals for the Second Circuit does not authorize the cross-appeal under Rule 8006(g), New GM, in the alternative, hereby cross appeals the Judgment under 28 U.S.C. § 158(a)(1) to the United States District Court for the Southern District of New York.

The names of all parties to the Judgment appealed from and the names, addresses, and telephone numbers of their respective counsel are as follows:

<p>KING & SPALDING LLP 1185 Avenue of the Americas New York, New York 10036 Telephone: (212) 556-2100 Facsimile: (212) 556-2222 By: Arthur J. Steinberg, Esq. Scott I. Davidson, Esq.</p> <p>KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200 By: Richard C. Godfrey, Esq. Andrew B. Bloomer, Esq.</p> <p><i>Counsel for General Motors LLC</i></p>	<p>BROWN RUDNICK Seven Times Square New York, New York 10036 Telephone: (212) 209-4800 Facsimile: (212) 209-4801 By: Edward S. Weisfelner, Esq. David J. Molton, Esq. May Orenstein, Esq. Howard S. Steel, Esq. Rebecca L. Fordon, Esq.</p> <p>STUTZMAN, BROMBERG, ESSERMAN & PLIFKA, P.C. 2323 Bryan Street, Suite 2200 Dallas, Texas 75201 Telephone: (214) 969-4900 Facsimile: (214) 969-4999 By: Sander L. Esserman, Esq.</p> <p><i>Designated Counsel for Economic Loss Plaintiffs</i></p>
---	---

<p>GOODWIN PROCTER, LLP The New York Times Building 620 Eighth Avenue New York, New York 10018 Telephone: (212) 813-8800 Facsimile: (212) 355-3333 By: William P. Weintraub, Esq. Eamonn O'Hagan, Esq. Gregory W. Fox, Esq.</p> <p><i>Designated Counsel for Pre-Sale Accident Plaintiffs</i></p>	<p>GOLENBOCK, EISEMAN, ASSOR, BELL & PESKOE, LLP 437 Madison Avenue New York, New York 10022 Telephone: (212) 907-7300 By: Jonathan L. Flaxer, Esq. Alex Schmidt, Esq. S. Preston Ricardo, Esq.</p> <p><i>Counsel for Groman Plaintiffs</i></p>
<p>GIBSON, DUNN & CRUTCHER, LLP 200 Park Avenue New York, New York 10166 Telephone: (212) 351-4000 Facsimile: (212) 351-4035 By: Lisa H. Rubin, Esq. Keith R. Martorana, Esq. Matthew Williams, Esq. Adam H. Offenhartz, Esq. Aric H. Wu, Esq.</p> <p><i>Counsel for Wilmington Trust Company as GUC Trust Administrator</i></p>	<p>AKIN, GUMP, STRAUSS, HAUER & FELD, LLP One Bryant Park New York, New York 10036 Telephone: (212) 872-1000 Facsimile: (212) 872-1002 By: Daniel Golden, Esq. Deborah J. Newman, Esq. Jamison A. Diehl, Esq. Naomi Moss, Esq.</p> <p><i>Counsel for Participating GUC Trust Unit Holders</i></p>
<p>GARY PELLER, Esq. 600 New Jersey Avenue, N.W. Washington, D.C. 20001 Telephone: (202) 662-9122 Facsimile: (202) 662-9680</p> <p><i>Counsel for the Elliott Plaintiffs and Sesay Plaintiffs</i></p>	

Dated: New York, New York
June 12, 2015

Respectfully submitted,

/s/ Arthur Steinberg
Arthur Steinberg
Scott Davidson
KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222

-and-

Richard C. Godfrey, P.C. (admitted *pro hac vice*)
Andrew B. Bloomer, P.C. (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200

Attorneys for General Motors LLC